



January 26, 2022

Clerk, United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, NJ 08608

Clerk, United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101
ecfhelp@njd.uscourts.gov

**Re: *Occidental Chemical Corp. v. 21st Century Fox Am., Inc., et al.*,
Civil Action No. 2:18-cv-11273-MCA**

**Re: *In re Congoleum Corporation*
Bankr. No. 03-51524**

Dear Sir/Madam:

We represent Occidental Chemical Corporation (“Occidental”) with regard to these cases. Occidental filed a Notice of Appeal in *In re Congoleum Corporation* on January 24, 2022.

Pursuant to Local Civ. Rule 40.1, Occidental notifies the Court that these two cases are “related,” and that the bankruptcy appeal “grows out of the same transaction as any case already pending in this Court,” i.e., No. 2:18-cv-11273. The appeal is from an Order of the Bankruptcy Court granting in part the Motion of Bath Iron Works, Inc. (“BIW”) to re-open the bankruptcy case for the purpose of foreclosing Occidental’s claims against BIW, which is a defendant in No. 2:18-cv-11273. BIW filed its Motion to Reopen after Occidental filed a Motion for Summary Judgment in No. 2:18-cv-11273, and both cases involve BIW’s liability to Occidental.

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Occidental respectfully requests that the Clerk assign the appeal of Bankr. No. 03-51524 to Judge Madeline Arleo, who presides over No. 2:18-cv-11273.

Sincerely,
Langsam Stevens Silver & Hollaender LLP

A handwritten signature in blue ink, appearing to read "Larry Silver", with a stylized, flowing script.

Larry Silver

cc (via ECF): Hon. Madeline C. Arleo
Hon. Leda Dunn Wettre
Thomas P. Scrivo, Esq.
Counsel of record